

Derek W. Loeser (admitted *pro hac vice*)
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Tel.: (206) 623-1900
Fax: (206) 623-3384
dloeser@kellerrohrback.com

Lesley Weaver (Cal. Bar No.191305)
BLEICHMAR FONTI & AULD LLP
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020
lweaver@bfalaw.com

Plaintiffs' Co-Lead Counsel

Additional counsel listed on signature page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

**DECLARATION OF MATTHEW S.
MELAMED IN SUPPORT OF
PLAINTIFFS' RESPONSE TO
STATEMENT IN SUPPORT OF
FACEBOOK'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Judge: Hon. Vince Chhabria and
Hon. Jacqueline Scott Corley
Courtroom: 4, 17th Floor

DECLARATION OF MATTHEW S. MELAMED

I, Matthew S. Melamed, hereby declare under the penalty of perjury:

1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am Senior Counsel at Bleichmar Fonti & Auld LLP, a member in good standing of the bar of the State of California and of this Court, and counsel to Plaintiffs in the above-captioned action.

2. This declaration is made upon personal knowledge in support of Plaintiffs' Response to Statement in Support of Facebook's Administrative Motion to File Under Seal.

3. Attached hereto as ***Exhibit A*** is a true and correct copy of a message posted on the Facebook platform by Mark Zuckerberg on March 21, 2018.

4. Attached hereto as ***Exhibit B*** is a true and correct copy of "An Update on Our App Investigation and Audit," authored by Ime Archibong, Facebook's VP of Product Partnerships, and published on Facebook's website on May 14, 2018.

5. Attached hereto as ***Exhibit C*** is a true and correct copy of "An Update on Our App Developer Investigation," authored by Ime Archibong, Facebook's VP of Product Partnerships, and published on Facebook's website on September 20, 2019.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 13th day of July 2021, in Oakland, California.

By: /s/ Matthew S. Melamed
Matthew S. Melamed